

# EXHIBIT “A”

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF SUFFOLK

-----X  
KIRSTEN JETER,

Plaintiff,

Index No.:

Date Index No. Purchased \_\_\_\_\_

-against-

SUMMONS

TARGET CORPORATION.,

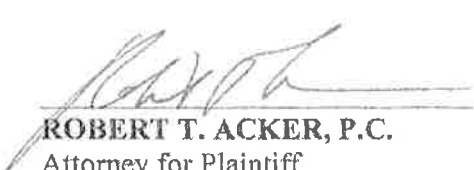
Defendant.  
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To the Person Named as Defendant Above:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to answer the complaint of the plaintiff herein and to serve a copy of your answer on the plaintiff at the address indicated below within 20 days after the service of this Summons (not counting the day of service itself), or within 30 days after service is complete if the Summons is not delivered personally to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT should you fail to answer, a judgment will be entered against you by default for the relief demanded in the complaint.

Dated: October 9, 2020

  
ROBERT T. ACKER, P.C.

Attorney for Plaintiff

390 North Broadway, Suite 200

Jericho, New York 11753

(516) 798-9800

Defendant's address: \_\_\_\_\_

Target Corporation  
838 Sunrise Highway  
Bay Shore, NY

Venue: Plaintiff designates Suffolk County as the place of trial. The basis of this designation is Plaintiff's Residence in Suffolk County.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF SUFFOLK-----X Index No.:  
KIRSTEN JETER,

Plaintiff,

VERIFIED COMPLAINT

-against-

TARGET CORPORATION.,

Defendant.  
-----X

Plaintiff, KIRSTEN JETER, by her attorney Robert T. ACKER, P.C., as and for her  
VERIFIED COMPLAINT, alleges the following upon information and belief:

1. At all times hereinafter mentioned, KIRSTEN JETER resided in the County of Suffolk.
2. At all times hereinafter mentioned, Defendant, Target Corporation ("TARGET" hereinafter) was and is a domestic corporation organized and existing under and by virtue of the laws of the State of New York.
3. At all times hereinafter mentioned TARGET, was a foreign corporation authorized to and doing business in the State of New York.
4. At all times hereinafter mentioned TARGET was authorized to and conducting business in the state of New York.
5. On and prior to the 1<sup>st</sup> day of April 2020, Defendant, TARGET, was in the business of operating general merchandise stores throughout the United States including Bay Shore, NY.
6. On and prior to the 1<sup>st</sup> day of April 2020, Defendant, TARGET, operated a general merchandise store located at the 838 Sunrise Highway, Bay Shore, NY.
7. On and prior to the 1<sup>st</sup> day of April 2020, Defendant, TARGET, invited members of the general public to shop at their store located at 838 Sunrise Highway, Bay Shore, NY.

8. On or about the 1<sup>st</sup> day of April 2020, the Plaintiff was a patron of and shopping at the TARGET located at 838 Sunrise Highway, Bay Shore, NY.

9. On or about the 1<sup>st</sup> day of April 2020 and because of the COVID-19 pandemic the Plaintiff was observing required medical safety protocols by wearing a face covering and/or mask.

10. On the 1<sup>st</sup> day of April 2020, when Plaintiff approached the checkout counter at the store and was near a register she was caused to faint and fall to the floor.

11. On the 1<sup>st</sup> day of April 2020, and after fainting and being on the floor the Plaintiff regained consciousness.

12. After regaining consciousness employees of TARGET requested that Plaintiff move to a chair they had brought for her to sit down on.

13. In response to the requests of the employee(s) of TARGET, the Plaintiff attempted to walk to the chair that had been placed several feet away from the checkout line at which point she was caused to faint again and fall to the floor.

14. As a result of the second fainting spell Plaintiff's face and body struck the floor.

15. As a result of the aforesaid occurrence, the Plaintiff sustained serious and severe personal injuries and nervous shock. The Plaintiff was rendered sick, sore and disabled, and has remained so since the subject occurrence. She has suffered, and continues to suffer, mental anguish, and has been compelled to expend money and incur obligations for physicians services, medical expenses, and hospital expenses for the care and treatment of her injuries; upon information and belief, she will be compelled to expend additional sums of money and incur further obligations in the future for additional physicians services, medical expenses, and hospital expenses for the further care and treatment of her injuries.

16. That as a result of the aforesaid occurrence and the injuries sustained by Plaintiff, she has been incapacitated from attending her usual occupation and has suffered pecuniary losses by reason thereof; and upon information and belief, the Plaintiff may be incapacitated from her occupation in the future and will suffer additional pecuniary loss.


17. The conduct of the employees of TARGET in failing to require that the Plaintiff remain on floor until appropriate medical attention was received and/or in requesting that she walk to chair as opposed to having the chair brought right to her so that could sit constituted negligence on the part of the employees without any fault of the Plaintiff contributing thereto.

18. By reason of the foregoing, Plaintiff demands Judgment against Defendant for an amount in excess of the jurisdiction of all lower Courts

**WHEREFORE**, Plaintiff, KIRSTEN JETER, respectfully requests judgment in an amount in excess of the jurisdiction of all the lower Courts together with costs interest and disbursements and such other and further relief that as to the Court may seem just and proper.

Dated: Jericho, New York  
October 9, 2020

ROBERT T. ACKER, P.C.

By:   
Robert T. Acker, Esq.  
Attorney for Plaintiff/KIRSTEN JETER  
390 N. Broadway, Suite 200  
Jericho, New York 11753  
(516) 798-9800

TO: TARGET CORPORATION  
Target Corporate Office | Headquarters  
1000 Nicollet Mall  
Minneapolis, MN 55403  
Phone: (612)304-6073

ATTORNEY'S VERIFICATION

STATE OF NEW YORK     )  
  ) ss.:  
COUNTY OF NASSAU     )

The undersigned, an attorney admitted to practice in the Courts of the State of New York, shows:

That deponent is a member of the firm of ROBERT T. ACKER, P.C., the attorney of record for Plaintiff, KIRSTEN JETER, in the within action; that deponent has read the foregoing Complaint and knows the contents thereof; that the same is true to deponent's own knowledge, except as to the matters therein stated to be alleged on information and belief, and that as to those matters deponent believes it to be true. Deponent further says that the reason this verification is made by deponent and not by Plaintiff is that Plaintiff is located in a County other than where deponent maintains his office.

The grounds of deponent's belief as to all the matters stated upon deponent's knowledge are as follows: correspondence, information and documents in deponent's files.

The undersigned affirms that the foregoing statements are true, under penalties of perjury.

Dated: Jericho, New York  
October 9, 2020

  
ROBERT T. ACKER